

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

IN THE MATTER OF THE
ESTABLISHMENT INSPECTION OF:

NISSAN NORTH AMERICA, INC.,
CANTON, MISSISSIPPI FACILITY
LOCATED AT 300 NISSAN DRIVE
CANTON, MISSISSIPPI 39046

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CASE NO. 3:16-MC-00692-HTW-LRA

AFFIDAVIT OF LETESIA BREWER

COUNTY OF FULTON)
)
STATE OF GEORGIA)

I, LETESIA BREWER, am over 18 years of age, legally competent to give this affidavit, and have personal knowledge of the facts set forth in this affidavit and being first duly sworn, do hereby state:

1. I am employed as a Paralegal Specialist in the Office of the Solicitor, United States Department of Labor, in Atlanta, Georgia. In that capacity I assist attorneys in my office with litigation of cases under various federal statutes, including the Occupational Safety and Health Act of 1974, 29 U.S.C. § 651 *et seq.*

2. I am assigned to work on the above-captioned warrant case with attorneys Karen E. Mock and Jean C. Abreu.

3. At the direction of Ms. Mock, I attempted to contact each of the forty-one (41) individuals whose names, signatures, and contact information appear on the Petition to Have Our

Own Representative During OSHA Inspections ("the Petition") to confirm the information on the Petition was correct.

4. When I reached a person, I confirmed whether they signed the Petition, whether they were employed at the plant when they signed, the department where they worked when they signed, and whether they wanted one of the persons listed on the Petition: Patricia Ruffin, Joseph Wilson, or Travis Parks, to represent them during an OSHA inspection when they signed.

5. At Ms. Mock's instruction, I sought the assistance of Ms. Ruffin, Mr. Wilson, and Mr. Parks to make contact with persons with whom I could not leave a voice mail (not set up, mailbox full), where the telephone number was not working or incorrect, or I had not received a call back in response to the voice mail message I had left. It is my understanding that some individuals work the day shift which makes it harder for us to make contact due to schedules and time zones. Individuals have limited access to their telephones while at work so they could only call while on break, during lunch, or after their shift.

6. As of 5:55 p.m. (EDT) on November 1, 2016, I have spoken to 22 individuals and all of them have confirmed their information on the Petition.

Letesia Brewer

LETESIA BREWER
Paralegal Specialist
Office of the Solicitor
United States Department of Labor
61 Forsyth Street, SW, Room 7T10
Atlanta, GA 30303

Sworn and subscribed to before me
this 1st day of November 2016.

Robin Richardson-Davis
NOTARY PUBLIC

My Commission Expires: *September 7, 2019*

